



SECTION 2.0
INTRODUCTION AND PURPOSE

2.0 INTRODUCTION AND PURPOSE

2.1 PURPOSE

The City of San Fernando (City), acting through the Redevelopment Agency, is the Lead Agency under the California Environmental Quality Act (*CEQA*), and is responsible for preparing the Environmental Impact Report (EIR) for the San Fernando Parking Lots Development Project (State Clearinghouse No. 2007081117). This EIR has been prepared in conformance with *CEQA* (California Public Resources Code Section 21000 et seq.), and the *CEQA Guidelines* (California Code of Regulations, Title 14, Section 15000 et seq.). The principal *CEQA Guidelines* sections governing content of this document are Sections 15120 through 15132 (Content of an EIR), and Section 15161 (Project EIR).

In accordance with Section 15121 of the *CEQA Guidelines*, a primary purpose of this EIR is to provide decision-makers and the public with specific information regarding the environmental effects associated with development of the site, identify ways to minimize the significant effects, and describe reasonable alternatives to the project. Mitigation measures are provided which may be adopted as Conditions of Approval in order to reduce the significance of impacts resulting from the project. In addition, this EIR is the primary reference document in the formulation and implementation of a mitigation monitoring program for the proposed project.

The City, acting through the Redevelopment Agency, which has the principal responsibility for processing and approving the project, and other public agencies (i.e., responsible and trustee agencies) that may use this EIR in the decision making or permit process will consider the information in this EIR, along with other information that may be presented during the *CEQA* process. Environmental impacts are not always mitigable to a level considered less than significant; in those cases, impacts are considered significant unavoidable impacts. In accordance with Section 15093(b) of the *CEQA Guidelines*, if a public agency approves a project that has significant impacts that are not substantially mitigated (i.e., significant unavoidable impacts), the agency shall state in writing the specific reasons for approving the project, based on the Final EIR and any other information in the public record for the project. This is termed, per Section 15093(b) of the *CEQA Guidelines*, a “statement of overriding considerations.”

This document analyzes the environmental effects of the project to the degree of specificity appropriate to the current proposed actions, as required by Section 15146 of the *CEQA Guidelines*. This analysis considers the actions associated with the project to determine the short-term and long-term effects associated with their implementation. This EIR discusses both the direct and indirect impacts of this project, as well as the cumulative impacts associated with other past, present, and reasonably foreseeable future projects. *CEQA* requires the preparation of an objective, full disclosure document to inform agency decision makers and the general public of the direct and indirect environmental effects of the proposed action; provide

mitigation measures to reduce or eliminate significant adverse effects; and identify and evaluate reasonable alternatives to the proposed project.

2.2 COMPLIANCE WITH CEQA

The Draft EIR is subject to a 45-day review period by responsible and trustee agencies and interested parties. In accordance with the provision of Sections 15085(a) and 15087(a)(1) of the *CEQA Guidelines*, the City of San Fernando Redevelopment Agency, serving as the Lead Agency: 1) publishes a notice of availability of a Draft EIR in newspapers of general circulation, which states that the Draft EIR will be available for review at City of San Fernando City Hall located at 117 Macneil Street; 2) prepares and transmits a Notice of Completion (NOC) to the State Clearinghouse; and 3) sends notices to all property owners within 500 feet of the subject property. Proof of publication is available at the City of San Fernando.

Any public agency or members of the public desiring to comment on the Draft EIR must submit their comments in writing to the individual identified on the document's NOC prior to the end of the public review period. During the public review period, the San Fernando Planning Commission will hold a regularly scheduled public meeting regarding the Draft EIR. The public will be afforded the opportunity to orally comment on the Draft EIR at the public meeting. Such comments shall be recorded and shall have the same standing and response requirements as written comments provided during the public review period. Upon the close of the public review period, the Lead Agency will then proceed to evaluate and prepare responses to all relevant oral and written comments received from both citizens and public agencies during the public review period.

The Final EIR will consist of the Draft EIR, revisions to the Draft EIR, responses to comments addressing concerns raised by responsible agencies or reviewing parties, and the mitigation monitoring program. After the Final EIR is completed and at least 10 days prior to its certification, a copy of the responses to comments made by public agencies on the Draft EIR will be provided to the respective agencies.

2.3 EIR SCOPING PROCESS

In compliance with the *CEQA Guidelines*, the City has taken steps to maximize opportunities to participate in the environmental process. During the preparation of the Draft EIR, an effort was made to contact various Federal, State, regional, and local government agencies and other interested parties to solicit comments and inform the public of the proposed project. This included the distribution of an Initial Study and Notice of Preparation (NOP).

2.3.1 INITIAL STUDY

In accordance with Section 15063(a) of the *CEQA Guidelines*, the City undertook the preparation of an Initial Study. The Initial Study determined that a number of environmental issue areas may be impacted by implementation of the proposed San Fernando Parking Lots Project. As a result, the Initial Study determined that this Draft EIR should address the project's potentially significant impacts on the following environmental issue areas:

- Land Use and Development;
- Population and Housing;
- Air Quality;
- Risk of Upset and Human Health;
- Noise;
- Public Services;
- Utilities;
- Aesthetics;
- Recreation; and
- Transportation and Circulation

Based on the Initial Study, issues for which no significant impacts are anticipated to occur are described in detail in the Initial Study (Appendix A) and addressed in Section 9.0, Effects Found Not To Be Significant, in this EIR.

2.3.2 NOTICE OF PREPARATION

Pursuant to the provision of Section 15082 of the *CEQA Guidelines*, the City circulated an NOP to public agencies, special districts, and members of the public requesting such notice for a 30-day period commencing on August 22, 2007 and ending on September 21, 2007. The purpose of the NOP was to formally convey that the City is preparing a Draft EIR for the San Fernando Parking Lots Development Project and that, as Lead Agency, it was soliciting input regarding the scope and content of the environmental information to be included in the EIR. The Initial Study was circulated with the NOP. The NOP, Initial Study, and responses to the NOP are provided, respectively, in Appendix A, Initial Study/Notice of Preparation, and Appendix B, NOP Comments.

2.3.3 SCOPING MEETINGS

In order to obtain input from affected agencies and other interested parties, including members of the public, a public scoping meeting on the proposed project was conducted at City Hall on August 30, 2007 at 6:30 PM. A second public scoping meeting was conducted at City Hall on October 10, 2007 at 6:30 PM. During both meetings, agencies and individuals were given

background information on the proposed project and provided input regarding specific environmental issues of concern.

2.3.4 NOP AND SCOPING RESULTS

The NOP/Initial Study was distributed for 30 days to various public agencies (refer to Appendix A for the distribution list) in order to receive input as to the scope and content of the environmental information to be provided in this EIR. Written comments were received from public agencies, organizations, and individuals. *Table 2-1, NOP and Scoping Meetings Comments*, summarizes the specific environmental concerns raised in response to the NOP and during the scoping meetings, and notes the EIR section in which the analysis is provided. The written comments are contained in Appendix B.

TABLE 2-1
NOP and Scoping Meetings Comments

Commenter	Date of Comments	Summary of Comments	EIR Section Topic Addressed ¹
NOP Comments			
Native American Heritage Commission	8/23/2007	Cultural Sensitivities; concerned about all appropriate measures to protect cultural resources, including use of thorough notification measures.	Initial Study Section 3.13
Metropolitan Transit Authority	8/22/2007	Traffic Impact Analysis; statement of CMP guidelines and steps for transit analysis.	Section 5.3
Allen Matkins LLP for Aszkenazy Development	9/21/2007	Scope of Analysis; concerned that all potential projects in City be considered in cumulative impacts. Light & Glare; encourages shadow studies and impacts to surrounding businesses. Tree Loss; concerned about tree loss due to proposed projects. Public Participation; wants more public meetings to discuss impacts.	Sections 4.1 and 5.2, Notice of Preparation
Los Angeles Unified School District	9/21/2007	Environmental; concerned about general environmental issues like air, noise, traffic and pollution. Schools; feels project will have significant impact on schools. Provided a suggested set of mitigation measures to address school bus access and pedestrian safety impacts.	Sections 5.5, 5.6, 5.3, and 5.10

TABLE 2-1 (Continued)
NOP and Scoping Meetings Comments

Commenter	Date of Comments	Summary of Comments	EIR Section Topic Addressed ¹
SCE	9/20/2007	Electrical infrastructure; wants SCE facilities analysis to be part of EIR. SCE transmission easements issues to be coordinated with SCE.	Section 5.15
California PUC	9/18/2007	Rail Corridor Safety; encourage safety planning for increased traffic and queuing at nearby rail crossings. Plan for grade separations and fencing.	Section 5.3
California Highway Patrol	9/7/2007	Traffic; concern about increased volume during rush hour on I-5 and SR-118.	Section 5.3
Mario Hernandez	9/21/2007	Public Notice; concerned that broader public noticing be done.	Notice of Preparation
Beverly D'tomaso	9/2007	Viewscape; concerned that multi-story buildings will impair local mountain views. Public Services; concerned about impacts to local services, schools, recreation, water, etc. Environmental; concerned about noise and air quality.	Sections 5.2, 5.8, 5.9, 5.10, 5.11, 5.12, 5.13, 5.14, 5.15, 5.6, and 5.5
Adriana Gomez	9/21/2007	Traffic; concerned about traffic/parking impacts and skewed low season data collected. Surrounding Projects; feels other proposed projects should be considered as part of analysis. Public Services; impacts to service levels and infrastructure. Economic; concerned about actual affordability of proposed residential units. Public Participation; feels all City residents should have input through broad citywide noticing.	Sections 5.3, 4.0, 5.8, 5.9, 5.10, 5.11, 5.12, 5.13, 5.14, 5.15, and 3.0, and Notice of Preparation
Richard Beaulieu	9/20/2007	Economic Concerns; affordability of proposed residential units for San Fernando residents. Service Levels; impacts to service due to population increase.	Sections 3.0, 5.8, 5.9, 5.10, 5.11, 5.12, 5.13, 5.14, and 5.15

**TABLE 2-1 (Continued)
NOP and Scoping Meetings Comments**

Commenter	Date of Comments	Summary of Comments	EIR Section Topic Addressed ¹
Scoping Meeting – August 30, 2007			
Violet Vicuna Business owner (1116 & 1118 Pico Ave.)	8/30/2007	Traffic and parking; her patrons use free public parking next to JC Penney. Air Emissions; noise and light, lives on Coronel St.	Sections 5.3, 5.4, 5.5, and 5.4
Victor Ceballos Business owner	8/30/2007	Parking; concerned that downtown parking will be negatively impacted.	Section 5.3
Juana Cuiriz Mall Association	8/30/2007	Public Noticing; does not feel that downtown merchants were able to participate due to poor noticing. Parking; feels parking survey was done during slow season thus producing skewed results. Alternate Plan; has ideas to incorporate into the Specific Plan.	Notice of Preparation, Section 5.3
Valley Family Center San Fernando, CA	8/30/2007	Traffic and parking, General circulation issues. Public Noticing.	Sections 5.3 and 5.4
Scoping Meeting – October 10, 2007			
Jaqueline Lopez Sun Valley	10/10/07	Traffic and parking, General circulation issues. Need more free parking.	Sections 5.3 and 5.4
Raquel Solozano Pacoima, CA	10/10/07	Traffic and parking, General circulation issues.	Sections 5.3 and 5.4
Miriam Abarca Sylmar, CA	10/10/07	Traffic and parking, General circulation issues.	Sections 5.3 and 5.4
Pauly Flores Sylmar, CA	10/10/07	Traffic and parking, General circulation issues.	Sections 5.3 and 5.4
Maria Martinez Sylmar, CA	10/10/07	Traffic and parking, General circulation issues.	Sections 5.3 and 5.4
Ismael Flores Sylmar, CA	10/10/07	Traffic and parking, General circulation issues.	Sections 5.3 and 5.4
Zimray Conberas Sylmar, CA	10/10/07	Traffic and parking, General circulation issues.	Sections 5.3 and 5.4
Arturo Vargas San Fernando, CA	10/10/07	Traffic and parking, General circulation issues.	Sections 5.3 and 5.4
Jesus Flores Sylmar, CA	10/10/07	Traffic and parking, General circulation issues.	Sections 5.3 and 5.4
Bertha Catalan San Fernando, Ca	10/10/07	Traffic and parking, General circulation issues.	Sections 5.3 and 5.4
Maria Trullio Arleta, CA	10/10/07	Traffic and parking, General circulation issues.	Sections 5.3 and 5.4

TABLE 2-1 (Continued)
NOP and Scoping Meetings Comments

Commenter	Date of Comments	Summary of Comments	EIR Section Topic Addressed ¹
Nancy Muniez Granada Hills, CA	10/10/07	Traffic and parking, General circulation issues.	Sections 5.3 and 5.4
Ashley Alvarado	10/10/07	Air Quality, noise, utility impacts, services, transportation and parking.	Sections 5.5, 5.6, 5.12, 5.13, 5.14, 5.15, 5.3, and 5.4
Maria Shorniez Mission, Ca	10/10/07	Traffic and parking, General circulation issues.	Sections 5.3 and 5.4
Nancy Muniz Mission, CA	10/10/07	Traffic and parking, General circulation issues.	Sections 5.3 and 5.4
Juan Gomez Mission Hills, CA	10/10/07	Traffic and parking, General circulation issues.	Sections 5.3 and 5.4
Lois Moctezuma	10/10/07	Traffic and parking, General circulation issues.	Sections 5.3 and 5.4
Sophie Moctezuma	10/10/07	Traffic and parking, General circulation issues.	Sections 5.3 and 5.4
Ricardo Flores	10/10/07	Traffic and parking, General circulation issues.	Sections 5.3 and 5.4
Paula Flores 204 Brand	10/10/07	Traffic and parking, General circulation issues.	Sections 5.3 and 5.4
Reyna Contera	10/10/07	Traffic and parking, General circulation issues.	Sections 5.3 and 5.4
Abma dela Fuente	10/10/07	Traffic and parking, General circulation issues.	Sections 5.3 and 5.4
Veronica Saucedo	10/10/07	Land use and Development, Traffic.	Sections 5.1 and 5.3
Stanley Silver	10/10/07	Concern about bidding process, recreation, housing and population, transportation.	Sections 5.10, 5.1 and 5.3
Shirley Bruno	10/10/07	City needs parks, housing over-built, water shortage, parking, over-crowding. Use American contractors only.	Sections 5.11, 5.1 and 5.12
Maria Serrano	10/10/07	Land use and development choices, wants more free parking.	Sections 5.1 and 5.4
Elvira Rauios	10/10/07	Need more parking, air quality, land use and development.	Sections 5.4, 5.5, and 5.1
Amalia Giron	10/10/07	Parking, impacts to over-crowded schools.	Sections 5.4 and 5.10
Angelica Banuelos	10/10/07	Transportation and parking, housing and population, noise, air quality.	Sections 5.3, 5.4, 7.0, 5.6, and 5.5
Felicia Boone	10/10/07	Air quality, noise, housing, transportation and parking.	Sections 5.5, 5.6, 7.0, 5.3, and 5.4
Julie Ocegueda	10/10/07	Public Service impacts	Sections 5.8, 5.9, 5.10, 5.11, 5.12, 5.13, 5.14, and 5.15

TABLE 2-1 (Continued)
NOP and Scoping Meetings Comments

Commenter	Date of Comments	Summary of Comments	EIR Section Topic Addressed ¹
Daniel Banuelos	10/10/07	Transportation and parking, recreation impacts.	Sections 5.3, 5.4, and 5.11
Circe Lucina Cox	10/10/07	Air Quality, noise, transportation and parking.	Sections 5.5, 5.6, 5.3 and 5.4
Maria Alvarado	10/10/07	Land Use, transportation and parking.	Sections 5.1, 5.3 and 5.4
Yadira Loza	10/10/07	Land use, transportation and parking.	Sections 5.1, 5.3 and 5.4
Petra Ocumpo	10/10/07	Land Use, air quality, noise, and recreation.	Sections 5.1, 5.5, 5.6 and 5.11
Jorge Aranda	10/10/07	Air quality, noise impacts.	Sections 5.5 and 5.6
John Brooks	10/10/07	Public services, aesthetics, transportation and parking, alter charm of City, fear of ghetto, public safety.	Sections 5.7, 5.8, 5.9, 5.10, 5.11, 5.12, 5.13, 5.2, 5.3, 5.4, 5.7, and 5.8
Louis Ososi	10/10/07	Parking, air quality	Sections 5.4 and 5.5
Eduardo Ochoa	10/10/07	Land use, air, noise, utilities, recreation, housing and population, human health, public services, aesthetics, transportation and parking.	Sections 5.1, 5.5, 5.10, 7.0, 5.7, 5.8, 5.9, 5.10, 5.11, 5.12, 5.13, 5.2, 5.3, 5.4, 5.7, 5.8, 5.2, 5.3, and 5.4
Rubinia Moran	10/10/07	Land use, air, noise, utilities, recreation, housing and population, human health, public services, aesthetics, transportation and parking.	Sections 5.1, 5.5, 5.10, 7.0, 5.7, 5.8, 5.9, 5.10, 5.11, 5.12, 5.13, 5.2, 5.3, 5.4, 5.7, 5.8, 5.2, 5.3, and 5.4
Kornlia ZouZou	10/10/07	Land use, air, noise, utilities, recreation, housing and population, human health, public services, aesthetics, transportation and parking.	Sections 5.1, 5.5, 5.10, 7.0, 5.7, 5.8, 5.9, 5.10, 5.11, 5.12, 5.13, 5.2, 5.3, 5.4, 5.7, 5.8, 5.2, 5.3, and 5.4
Maria Landros	10/10/07	Land use, air, noise, utilities, recreation, housing and population, human health, public services, aesthetics, transportation and parking.	Sections 5.1, 5.5, 5.10, 7.0, 5.7, 5.8, 5.9, 5.10, 5.11, 5.12, 5.13, 5.2, 5.3, 5.4, 5.7, 5.8, 5.2, 5.3, and 5.4
Beverly Ditomaso	10/10/07	Land use, air, noise, utilities, recreation, housing and population, human health, public services, aesthetics, transportation and parking.	Sections 5.1, 5.5, 5.10, 7.0, 5.7, 5.8, 5.9, 5.10, 5.11, 5.12, 5.13, 5.2, 5.3, 5.4, 5.7, 5.8, 5.2, 5.3, and 5.4

**TABLE 2-1 (Continued)
NOP and Scoping Meetings Comments**

Commenter	Date of Comments	Summary of Comments	EIR Section Topic Addressed ¹
Danial Ditamaso	10/10/07	Land use, air, noise, utilities, recreation, housing and population, human health, public services, aesthetics, transportation and parking.	Sections 5.1, 5.5, 5.10, 7.0, 5.7, 5.8, 5.9, 5.10, 5.11, 5.12, 5.13, 5.2, 5.3, 5.4, 5.7, 5.8, 5.2, 5.3, and 5.4
1 EIR sections are referenced in the order that comments are listed.			

2.4 FORMAT OF THE EIR

The Draft EIR is organized into 11 sections, plus nine Appendices, as follows.

Section 1.0, Executive Summary, provides a brief project description and summary of the environmental impacts and mitigation measures.

Section 2.0, Introduction and Purpose, provides CEQA compliance information.

Section 3.0, Project Description, describes the project in detail indicating project location, background and history, and project characteristics, phasing and objectives, as well as associated discretionary actions required.

Section 4.0, Basis of Cumulative Analysis, describes the approach and methodology for the cumulative analysis.

Section 5.0, Environmental Analysis, contains a detailed environmental analysis of the existing conditions, project impacts (including direct and indirect, short-term and long-term, and cumulative), recommended mitigation measures, and unavoidable adverse impacts.

Section 6.0, Alternatives to the Proposed Project, describes a reasonable range of alternatives to the project or to the location of the project that could feasibly attain the basic project objectives.

Section 7.0, Long-Term Implications of the Proposed Project, discusses growth-inducing impacts and irreversible changes associated with the proposed project.

Section 8.0, Significant Unavoidable Environmental Effects Which Cannot be Avoided if the Proposed Action is Implemented, discusses significant environmental changes that would be involved with the proposed project, should it be implemented.

Section 9.0, Effects Found Not To Be Significant, explains potential impacts that have been determined not to be significant.

Section 10.0, Organizations and Persons Consulted, identifies all Federal, State or local agencies, other organizations, and individuals consulted in the preparation of the EIR.

Section 11.0, Bibliography, identifies reference sources for the EIR.

The following Appendices contain the technical documentation for the project:

- A. Initial Study/Notice of Preparation
- B. NOP Comments
- C. Traffic Impact Study
- D. Parking Study
- E. Air Quality Data
- F. Noise Data
- G. Public Service/Utility Correspondence
- H. Environmental Site Assessment (for Firestone site only)
- I. Public Service/Utility Calculations

2.5 RESPONSIBLE AND TRUSTEE AGENCIES

Certain projects or actions undertaken by a Lead Agency require subsequent oversight, approvals, or permits from other public agencies in order to be implemented. Such other agencies are referred to as Responsible Agencies and Trustee Agencies. Pursuant to Sections 15381 and 15386 of the *CEQA Guidelines*, Responsible Agencies and Trustee Agencies are respectively defined as follows:

“Responsible Agency” means a public agency that proposes to carry out or approve a project, for which a Lead Agency is preparing or has prepared an EIR or Negative Declaration. For the purposes of *CEQA*, the term “Responsible Agency” includes all public agencies other than the Lead Agency which have discretionary approval power over the project (Section 15381).

“Trustee Agency” means a State agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California. Trustee Agencies include (Section 15386):

- (a) The California Department of Fish and Game with regard to the fish and wildlife of the State, to designated rare or endangered native plants, and to game refuges, ecological reserves, and other areas administered by the Department;
- (b) The State Lands Commission with regard to state-owned “sovereign” lands such as the beds of navigable waters and State school lands;

- (c) The State Department of Parks and Recreation with regard to units of the State Park System;
- (d) The University of California with regard to sites within the Natural Land and Water Reserves System (Section 15386).

Responsible and Trustee Agencies and other entities that may use this EIR in their decision-making process or for informational purposes include, but may not be limited to, the following:

- County of Los Angeles;
- California Department of Transportation (Caltrans);
- Los Angeles County Sanitation District;
- Los Angeles Regional Water Quality Control Board;
- Regional Water Quality Control Board, Region 4;
- South Coast Air Quality Management District; and
- Southern California Association of Governments.

2.6 INCORPORATION BY REFERENCE

Pertinent documents relating to this EIR have been cited in accordance with Section 15148 of the *CEQA Guidelines*, which encourages “incorporation by reference” as a means of reducing redundancy and length of environmental reports. The following documents, which are available for public review at the City of San Fernando Community Development Department, located at 117 Macneil Street, San Fernando, California, are hereby incorporated by reference into this EIR. Information contained within these documents has been utilized for each section of this EIR. A brief synopsis of the scope and content of these documents are provided below.

City of San Fernando General Plan (General Plan), 1987 and 2005. The *City of San Fernando General Plan* provides comprehensive planning for the future of the City. The goals and policies contained in the *General Plan* are provided to guide the decision-makers. It integrates the mandatory and discretionary elements among six major chapters: Land Use, Circulation, Housing, Open Space/Conservation/Parks-Recreation, Safety, and Noise. In addition, in 2005 the City adopted the Historic Preservation element as the optional seventh element of the *General Plan*, which focuses on the preservation of the City’s cultural resources. The analysis of existing conditions and potential project impacts included in this EIR incorporates information from all elements of the *General Plan*.

The San Fernando Corridors Specific Plan, January 2005. The City of San Fernando prepared *The San Fernando Corridors Specific Plan* as a tool to help guide and realize the vision for revitalization of the Maclay Avenue, Truman Street, and San Fernando Road corridors. The purpose of the *Specific Plan* is to put in place policies and strategies to transform the area into attractive, livable, and economically vital districts. This document provides a comprehensive set

of planning principles, policies, standards, and design guidelines for private development and public improvements within the *Specific Plan* area.

The San Fernando Corridors Specific Plan Initial Study/MND, October 23, 2004. *The San Fernando Corridors Specific Plan Initial Study/MND* analyzes and summarizes potential environmental impacts associated with implementation of the *Specific Plan*. The *Initial Study/MND* also serves as a benchmark to assess environmental impacts of future projects within the *Specific Plan* area.

City of San Fernando Code of Ordinances, adopted February 5, 2001. The *Code of Ordinances (Municipal Code)* consists of all the regulatory, penal, and administrative ordinances of the City of San Fernando. It is the method the City uses to implement control of land uses, in accordance with applicable goals and policies. The *City of San Fernando Zoning Ordinance (Chapter 106 of the Municipal Code)* identifies the permitted land uses according to the zoning category of particular parcels. Specific rules and regulations for construction, alteration, and building for the purpose of human habitation are provided in Division 6, Property Development Standards.